

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 1343 - Wire Fraud; 18 U.S.C. § 287 - False Claims;
18 U.S.C. § 1028A - Identity Theft;
26 U.S.C. § 7212(a) - Obstruction☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

CLAUDIA ROBINSON

DISTRICT COURT NUMBER

CR11-00671 SBA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Internal Revenue Service

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underName and Office of Person
Furnishing Information on this form MELINDA HAAG☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned) THOMAS M. NEWMAN, AUSA**IS NOT IN CUSTODY**Has not been arrested, pending outcome this proceeding.
1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer
been filed? ☐ Yes ☐ NoIf "Yes"
give date
filedDATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time:

Before Judge:

Comments:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

ATTACHED PENALTY SHEET

Defendant CLAUDIA ROBINSON

COUNTS ONE THROUGH EIGHT: (18 U.S.C. § 1343 – Wire Fraud) - EACH COUNT

20 years imprisonment, \$1,000,000 fine, 5 years supervised release, \$100 special assessment

COUNTS NINE THROUGH SIXTEEN: (18 U.S.C. § 287 – False Claims)

5 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 special assessment

COUNTS SEVENTEEN THROUGH TWENTY-FOUR:

(18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft) - EACH COUNT

Mandatory minimum term of 2 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 special assessment

COUNT TWENTY-FIVE: (26 U.S.C. § 7212(a)) - (Obstructing Due Administration of IRS)

3 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 special assessment

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: Oakland

CR11-00671 SBA

UNITED STATES OF AMERICA,

v.

CLAUDIA ROBINSON,

FILED

SEP 15 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

DEFENDANT.

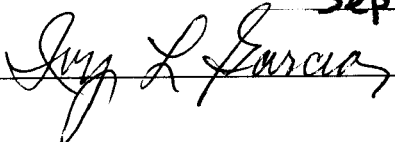
INDICTMENT

18 U.S.C. § 1343 – Wire Fraud; 18 U.S.C. § 287 – False Claims;
18 U.S.C. § 1028A – Identity Theft; and 26 U.S.C. § 7212(a) – Obstruction


A true bill.


Foreman

Filed in open court this 15 day of
Sept 2011


Clerk

Bail, \$

no bail warrant


MELINDA HAAG (CABN 132612)
United States Attorney

FILED

SEP 15 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLAUDIA ROBINSON,

Defendant.

No. CR-

CR11-00671

VIOLATIONS: 18 U.S.C. § 1343 – Wire
Fraud; 18 U.S.C. § 287 – False Claims;
18 U.S.C. § 1028A – Identity Theft; and
26 U.S.C. § 7212(a) – Obstruction

OAKLAND VENUE

SBA

INDICTMENT

The Grand Jury charges:

THE SCHEME TO DEFRAUD

At all times relevant to this Indictment:

1. Defendant CLAUDIA ROBINSON resided in Hayward, California.

2. At some date prior to January 26, 2008, ROBINSON obtained the personal identifying information of other individuals, including the person's name and Social Security number.

3. ROBINSON used the personal identifying information that she obtained to file false claims with the Internal Revenue Service using that information.

4. ROBINSON used the person's name, and claimed on a U.S. Individual Income Tax Return that the individual received income related to a fictitious business.

INDICTMENT

5. ROBINSON further claimed that the individual was entitled to the Earned Income Tax Credit ("EIC"), and at times added dependants to the false tax returns in order to fraudulently inflate the EIC payment.

6. ROBINSON filed the false claims electronically from her residence and directed the Internal Revenue Service to wire the fraudulent refund to debit cards ROBINSON obtained in the name of other individuals.

COUNTS ONE THROUGH EIGHT: (18 U.S.C. § 1343 – Wire Fraud)

7. Paragraphs 1 through 6 above are realleged and by this reference fully incorporated herein.

8. On or about the dates listed below, in the Northern District of California and elsewhere, the defendant,

CLAUDIA ROBINSON,
did knowingly and intentionally devise a material scheme and artifice to defraud, and to obtain money, by means of material false and fraudulent pretenses, and representations made on false claims filed with the Internal Revenue Service, and for the purpose of executing such scheme and artifice did transmit and cause to be transmitted, by means of wire communications in interstate commerce, certain writings, signs, signals, and sounds, including the interstate wires transmitting false federal income tax returns as described below:

Count	Date of Filing	Amount of Requested Wire Payment	Initials of Individual Listed on False Claim
1	1/26/2008	\$2,929	C.H.
2	1/26/2008	\$2,927	T.L.
3	1/28/2008	\$2,909	V.L.
4	1/31/2008	\$2,927	T.B.
5	2/01/2008	\$2,929	L.B.
6	2/02/2008	\$2,927	P.S.
7	2/12/2008	\$2,914	C.B.
8	2/12/2008	\$2,926	D.B.

All in violation of Title 18, United States Code, Section 1343.

COUNTS NINE THROUGH SIXTEEN: (18 U.S.C. § 287 – False Claims)

9. Paragraphs 1 through 6 are realleged and incorporated as if fully set forth here.

10. On or about the date listed below, in the Northern District of California, the defendant,

CLAUDIA ROBINSON,

made and presented to the United States Treasury Department a claim against the United States for payment of a refund of taxes, which she then and there knew to be false, fictitious, and fraudulent. ROBINSON made the claims by preparing and causing to be prepared, false 2007 U.S. Individual Income Tax Returns, Forms 1040, which were presented to the United States Treasury Department, through the Internal Revenue Service as follows:

Count	Date of Filing	Amount of Claim	Initials of Individual Listed on False Claim
9	1/26/2008	\$2,929	C.H.
10	1/26/2008	\$2,927	T.L.
11	1/28/2008	\$2,909	V.L.
12	1/31/2008	\$2,927	T.B.
13	2/01/2008	\$2,929	L.B.
14	2/02/2008	\$2,927	P.S.
15	2/12/2008	\$2,914	C.B.
16	2/12/2008	\$2,926	D.B.

All in violation of Title 18, United States Code, Section 287.

COUNT SEVENTEEN: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

On or about January 26, 2008, in the Northern District of California, the defendant,

CLAUDIA ROBINSON,

did knowingly possess and use, without lawful authority, a means of identification of another person, specifically, C.H.'s name and Social Security number, during and in relation to a felony violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

1 COUNT EIGHTEEN: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

2 On or about January 26, 2008, in the Northern District of California, the defendant,
3 CLAUDIA ROBINSON,
4 did knowingly possess and use, without lawful authority, a means of identification of another
5 person, specifically, T.L.'s name and Social Security number, during and in relation to a felony
6 violation of Title 18, United States Code, Section 1343.

7 In violation of Title 18, United States Code, Section 1028A(a)(1).

8 COUNT NINETEEN: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

9 On or about January 28, 2008, in the Northern District of California, the defendant,
10 CLAUDIA ROBINSON,
11 did knowingly possess and use, without lawful authority, a means of identification of another
12 person, specifically, V.L.'s name and Social Security number, during and in relation to a felony
13 violation of Title 18, United States Code, Section 1343.

14 All in violation of Title 18, United States Code, Section 1028A(a)(1).

15 COUNT TWENTY: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

16 On or about January 31, 2008, in the Northern District of California, the defendant,
17 CLAUDIA ROBINSON,
18 did knowingly possess and use, without lawful authority, a means of identification of another
19 person, specifically, T.B.'s name and Social Security number, during and in relation to a felony
20 violation of Title 18, United States Code, Section 1343.

21 All in violation of Title 18, United States Code, Section 1028A(a)(1).

22 COUNT TWENTY-ONE: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

23 On or about February 1, 2008, in the Northern District of California, the defendant,
24 CLAUDIA ROBINSON,
25 did knowingly possess and use, without lawful authority, a means of identification of another
26 person, specifically, L.B.'s name and Social Security number, during and in relation to a felony
27 violation of Title 18, United States Code, Section 1343.

28 All in violation of Title 18, United States Code, Section 1028A(a)(1).

1 COUNT TWENTY-TWO: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

2 On or about February 2, 2008, in the Northern District of California, the defendant,
3 CLAUDIA ROBINSON,
4 did knowingly possess and use, without lawful authority, a means of identification of another
5 person, specifically, P.S.'s name and Social Security number, during and in relation to a felony
6 violation of Title 18, United States Code, Section 1343.

7 All in violation of Title 18, United States Code, Section 1028A(a)(1).

8 COUNT TWENTY-THREE: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

9 On or about February 12, 2008, in the Northern District of California, the defendant,
10 CLAUDIA ROBINSON,
11 did knowingly possess and use, without lawful authority, a means of identification of another
12 person, specifically, C.B.'s name and Social Security number, during and in relation to a felony
13 violation of Title 18, United States Code, Section 1343.

14 All in violation of Title 18, United States Code, Section 1028A(a)(1).

15 COUNT TWENTY-FOUR: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

16 On or about February 12, 2008, in the Northern District of California, the defendant,
17 CLAUDIA ROBINSON,
18 did knowingly possess and use, without lawful authority, a means of identification of another
19 person, specifically, D.B.'s name and Social Security number, during and in relation to a felony
20 violation of Title 18, United States Code, Section 1343.

21 All in violation of Title 18, United States Code, Section 1028A(a)(1).

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1 COUNT TWENTY-FIVE: (26 U.S.C. § 7212(a)) - (Obstructing Due Administration of IRS)

2 That beginning on April 9, 2008, and continuing thereafter, in the Northern District of
3 California, the defendant,

4 CLAUDIA ROBINSON,

5 did corruptly endeavor to obstruct or impede the due administration of the Internal Revenue
6 Laws by: (1) offering to provide and providing items of value, in one case a television, to
7 witnesses whom ROBINSON asked to give false or misleading testimony regarding a pending
8 investigation; (2) attempting to conceal and take a bag that ROBINSON falsely claimed had
9 homework in it, but actually contained false tax returns and correspondence related to an ongoing
10 investigation.

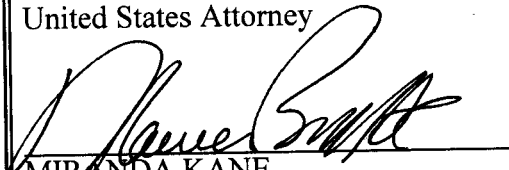
11 All in violation of Title 26, United States Code, Section 7212(a).

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14 Dated: 15 Sept. 2011

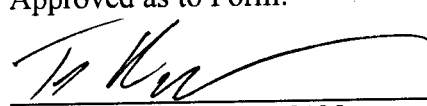
A True Bill


FOREPERSON

15
16 MELINDA HAAG
17 United States Attorney

18 
19 MIRANDA KANE
20 Chief, Criminal Section

21 Approved as to Form:

22 
23 THOMAS M. NEWMAN
24 Assistant United States Attorney
25 Tax Division
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27
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